

NSTAR Electric
Department of Telecommunications and Energy
D.T.E. 03-121
Information Request: **NSTAR-JS-1-31**
April 5, 2004
Person Responsible: Mr. Dave Hannus
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Information Request NSTAR-JS-1-31

Please provide copies of (1) any and all prefiled testimony or reports (including all associated exhibits and attachments) submitted by Mr. Hannus to state and federal regulatory authorities from 1999 to the present; and (2) any and all transcripts of Mr. Hannus' testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1999 to the present.

Response

Mr. Hannus has not submitted any such testimony. Please refer to Mr. Hannus's filed testimony in this proceeding. Mr. Hannus is not a professional regulatory consultant. Mr. Hannus runs a distributed generation business and filed testimony in this matter because of the adverse effect NSTAR's rate proposal would have on the distributed generation business and his potential customers in Massachusetts, if it were approved.

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Provide copies of any and all regulatory decisions addressing the issues covered by Mr. Hannus in testimony provided in response to Information Request NSTAR-JS-2-1. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.

Response

See response to Request NSTAR-JS-1-31.

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Please identify all documents relied upon by Mr. Hannus in preparing this testimony. Please provide a copy of each identified document.

Response

1. Tariff proposal submitted by NSTAR (already on the record).
2. Cogeneration savings spreadsheet presented on www.coenergyamerica.com web site; attached as "NSTAR-JS-1-33 Attachment 1".

Information Request NSTAR-JS-1-34

Please provide a copy of any and all articles, papers, speeches or other reports prepared in whole or in part by Mr. Hannus addressing, distributed generation, standby rates and/or rate design.

- (a) standby service;
- (b) distributed generation;
- (c) distribution planning;
- (d) rate design or cost allocation for regulated utilities; and
- (e) PURPA and PURPA-related issues.

Response

See www.coenergyamerica.com web site, printout attached as "NSTAR-JS-1-34 Attachment 2".

Otherwise, Mr. Hannus has not prepared or participated in the preparation of any articles, papers, speeches or other reports regarding the enumerated topics. Mr. Hannus is not a professional industry advocate or rate consultant. Mr. Hannus runs a distributed generation business and developed his expertise in such matters solely to support his business and his potential customers.

Information Request NSTAR-JS-1-35

Please describe in detail any and all electric self-generation systems designed by your company that have been installed by customers in Massachusetts. The identity of the customers may be redacted to protect their privacy. The description shall include, but not be limited to, the following information:

- (a) the installation date of the system;
- (b) the size (i.e., nameplate rating) of the self-generation unit;
- (c) the thermal source used to generate electricity;
- (d) the fuel used to produce the energy;
- (e) the annual number of kilowatt-hours produced (actual and estimated); and
- (f) The annual number of hours the self-generation unit is operational.
- (g) the date, duration and size (MW) of outages since the generator came on line. For each outage, identify whether it was forced or planned.

Response

1. Eastern Massachusetts School # 1

- a) July 2002
- b) Two 235 kW induction cogeneration units.
- c) Natural Gas.
- d) Natural Gas.
- e) Designed to produce 4 MW annually, actual production depends upon customer operating decisions.
System has been operating at less than plate rating until a power wiring upgrade can be performed. This upgrade will be completed in Q2, 2004.
- f) 8700 hours +/-, units available for operation all hours
- g) Company performs routine equipment maintenance at approximately every 1000 hours of operation, powering down each unit for two hours.

2. Eastern Massachusetts School # 2

- a) October 2003
- b) One 250 kW induction cogeneration unit.
- c) Natural Gas.
- d) Natural Gas
- e) Designed to produce .9 MW annually, actual production depends upon customer operating decisions.
- f) 3600 hours +/-, unit available for operation all hours
- g) No outages except for maintenance.

3. Eastern Massachusetts School # 3

- a) November 2003
- b) One 250 kW induction cogeneration unit
- c) Natural Gas.
- d) Natural Gas.
- e) Designed to produce .9 MW annually, actual production depends upon customer operating decisions.
- f) 3600 hours +/-, unit available for operation all hours.
- g) No outages except for maintenance.

4. Eastern Massachusetts School # 4

- a) January 2004
- b) Two 150 kW induction cogeneration units.
- c) Natural Gas
- d) Natural Gas.
- e) Designed to produce 1.8 MW annually, to date 0 (awaiting NSTAR inspection).
- f) 8700 hours one unit, 3600 hours second unit, both units available for operation all hours.
- g) Unit only has been run for test at this time.

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Information Request NSTAR-JS-1-36

Identify all environmental permits required to operate each of the projects identified in Information Request NSTAR-JS-2-5.

Response

None required.

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Information Request NSTAR-JS-1-37

Provide all correspondence between Co-Energy America and its customers concerning NSTAR Electric's proposed rates in this proceeding.

Response

Mr. Hannus has no responsive non-privileged correspondence.

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Provide a copy of all presentations made by Co-Energy America concerning NSTAR Electric's proposed rates in this proceeding.

Response

Co-Energy America, Inc. has made no such presentations.

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Provide copies of all documents, studies, reports or other information sent by Co-Energy America to its customers or potential customers concerning NSTAR Electric's proposed rates in this proceeding.

Response

Mr. Hannus has no responsive non-privileged correspondence.

Information Request NSTAR-JS-1-40

Please provide Mr. Hannus' understanding of how the provisions of NSTAR Electric's proposed standby rates concerning "grandfathering" existing DG installations would apply with respect to:

- (a) DG project operational prior to October 23, 2003;
- (b) DG projects operational prior to February 1, 2004; and
- (c) DG projects installed prior to August 1, 2004.

Response

- a) According to NSTAR's initial filing, DG projects operational prior to October 23, and indeed prior to December 1, would not be subject to the standby tariff. (The initial testimony of Mr. Hannus inadvertently referenced an incorrect date in the month of NSTAR's filing.)
- b) According to NSTAR's letter of January 16, 2004, DG projects operational prior to February 1, 2004 would not be subject to the proposed Standby tariff.
- c) Subject to the terms of the six-month suspension period proposed in NSTAR's January 16, 2004 letter, I understand that projects completed prior to August 1, 2004 would not be subject to the proposed standby tariffs.